

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:)	
)	
2006 Quadrennial Review – Review of the)	
Commission’s Broadcast Ownership Rules)	MB Dockets No. 06-121,
and Other Rules Adopted Pursuant to)	02-277, 01-235, 01-317, 00-244
Section 202 of the Telecommunications)	
Act of 1996)	
)	
2002 Biennial Regulatory Review – Review)	
Of the Commission’s Broadcast Ownership)	
Rules and Other Rules Adopted Pursuant to)	
Section 202 of the Telecommunications)	
Act of 1996)	
)	
Cross-Ownership of Broadcast Stations and)	
Newspapers)	
)	
Rules and Policies Concerning Multiple)	
Ownership of Radio Broadcast Stations in)	
Local Markets)	
)	
Definition of Radio Markets)	

To The Commission and the Media Bureau

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Re: Recommendations regarding the FCC's proposed studies for the media ownership proceeding.

In response to the Federal Communications Commission's (FCC) Further Notice of Proposed Rulemaking (FNPRM) regarding its consolidated review of Broadcast Ownership Rules (MB Dockets No. 06-121, 02-277, 01-235, 01-317, 00-244) [hereinafter "Media Ownership Proceeding"], we would like to suggest that the FCC undertake several studies to build the record for this proceeding. The FCC's June 21, 2006 News Release for the Media Ownership Proceeding lists several studies that the FCC plans to conduct and states that \$200,000 has been budgeted for these studies. That list included:

How people get news and information
Competition within types of media and across media platforms
Marketplace changes since the Commission last reviewed its ownership rules
Localism
Minority participation in today's media environment
Independent and diverse programming in today's media environment
The impact of ownership on the production of children's and family-friendly programming.

We also understand that the FCC is informally discussing the study of several topics as described below. We propose that such studies analyze the following issues to develop a full record on how media ownership affects all Americans. The outlines listed under studies number 1-6 reflect our understanding of the tentative topics the FCC will study. The comments reflect our suggestions about the scope and methodology of those studies and related research questions. We also suggest other areas the FCC should investigate in connection with the Media Ownership proceedings.

Study #1 How People Get News and Info

FCC Proposed study would survey consumers' use of media including:

- sources of news
- pricing associated with pay services
- the questions would identify what individuals view as their primary, secondary, and tertiary sources and how and if those priorities shift based on time of day or day of the week.

Comments about study topic and methodology:

We agree that it is important to analyze how media use changes according to time of day. Radio is the most important source of news during the morning and continues as a major source of news for many people during the day. Television dominates at night. However, African-Americans and Latinos continue to rely on the radio for news into the evening (and also listen to the radio more in the evening than other racial or ethnic groups).¹ Thus, it is also critical to analyze source of news by race, ethnicity, language and income. Lower levels and quality of internet access for African-Americans and Latinos,² as well as those over 65, low-income families, the disabled and those living in

¹ Radio and Television News Directors Foundation (2001) The American radio news audience survey: Examining the use, perception and future of radio news. <http://www.rtnda.org/radio>.

² Leonard Baynes, Race, Media Consolidation and Online Content, The Lack of Substitutes Available to

rural areas,³ must be investigated to reveal the limits of substitution between the internet and broadcast radio and television as a source of news and public affairs information.

African-Americans and Hispanics listen to the radio and watch television far more time per day than Whites, with Spanish-speaking Hispanics listening more than English-speaking Hispanics or Whites.⁴ African-Americans have the lowest level of internet access at home compared to other racial or ethnic groups at all levels of income.⁵ The General Accounting Office found that in 2005, 41 percent of American households did not have an internet connection from home.⁶ Of those households who did not have access to the internet, more than 75% did not have a computer at home.⁷ Thus, to the extent the studies examine the internet as a source of news access, they must investigate WHERE people are accessing the internet, how it breaks down by time and by race, ethnicity and language. Many workplaces restrict non-work based searches so while a person might indicate they have internet access (meaning they have access at work), their employers and privacy concerns may limit their ability to use the internet to look for news or health information, for example. The researchers and the FCC must be cautious in drawing conclusions about the use of the

Media Consumers of Color, 39 U. Mich. J.L. Reform 199 (2006) [hereinafter, Baynes, Race, Media Consolidation] (lack of internet access or reliance on public internet access for African-Americans and Latinos make the internet a poor substitute news source for African-Americans and Latinos). “Media Ownership Matters: Localism, The Ethnic Minority News Audience and Community Participation,” by Carolyn M. Byerly, Kehbama Langmia and Jamalia A. Cupid, available at: <http://www.ssrc.org/programs/media/publications/MediaOwnershipReport.pdf>, analyzed patterns of news consumption in three neighborhoods in the Washington D.C. area in Summer 2006. They asked participants which news media they used most often for *local news and information*, recording up to four responses per person. Commercial television news stations were by far the most frequently cited sources (45%), with the local Fox and NBC affiliates ranking top, and both ABC and CBS trailing. Newspapers (28%) ranked second. Radio, both commercial and non-commercial (18%), and the Internet (6%) were among the least cited categories of news sources. African-American-owned radio stations were the most frequently cited in the radio category (the ethnic group comprising the largest percentage of participants). Additionally, participants who identified the Internet as a news source nearly always identified it alongside other media, rather than as a sole source of news.

³ The General Accounting Office (GAO) in its May 2006 Study, “Broadband Deployment is Extensive Throughout the United States, but It Is Difficult to Assess The Extent of Deployment Gaps in Rural Areas,” [hereinafter GAO, Broadband Study], <http://www.gao.gov/new.items/d06426.pdf> found gaps in access to broadband networks and computers to be most pervasive in rural and low-income households and to be lower in minority than white-headed households.

⁴ Arbitron reported that average time spent listening (TSL) to the radio was: 17:42:51 minutes per day for Whites; 19:02:05 minutes for English-Speaking Hispanics; 21:34.52 minutes for Spanish-speaking Hispanics; 20:19:37 minutes for African-Americans. www.arbitron.com/radio_stations/ethnicTSL_market.htm.

⁵ In 2006, 31% of African-American Households had internet access at home, compared to 42% of White households and 41% of Hispanic, English-Speaking Households. Susannah Fox, Pew Internet & American Life Project, Demographics, Degrees of Internet Access and Health, Identifying and Disseminating Best Practices for Health eCommunities, June 19, 2006, at 4, available at http://www.pewinternet.org/ppt/Fox_UNC_June_2006.pdf; , Susannah Fox, Digital Divisions, There are Clear Differences among those with Broadband Connections, Dial-up connections and No Connections at all to the Internet, October 5, 2005 [hereinafter Pew, Digital Divisions], http://www.pewinternet.org/pdfs/PIP_Digital_Divisions_Oct_5_2005.pdf; Baynes, Race, Media Consolidation at 212-220.

⁶ GAO, Broadband Study, Figure 1.

⁷ Id.

internet as a news source since internet access is not universally available across communities, households and workplaces and quality of access varies widely.

The study should also break down media sources by age and gender, along with race, ethnicity and language. Pew Internet & American Life Project found that in 2002 22% of American adults were unconnected to e-mail, most were females over the age of 65.⁸

The study should also investigate the role of pricing in internet access, recognizing that pricing also involves the cost of computer acquisition and training. The study must also recognize pricing differences by region, and those based on whether lower priced bundles of services are offered to or purchased by consumers. Particularly in rural areas where there is less deployment of cable or DSL, where states have set low service requirements for building out the infrastructure to support video and broadband services in low-income areas,⁹ some consumers do not and will not have the opportunities to access broadband that some urban, suburban and high-income consumers have or will have, or can only access it at much higher prices or lower speeds. Though it is not clear what the FCC intends to study under “pricing associated with pay services,” such an analysis must be linked to infrastructure deployment issues that lead to pricing disparities, particularly for rural and low-income communities.

The study should also examine the news sources of over-the-air dependent households. The FCC Mass Media Bureau issued a Working Paper on such households in 2005.¹⁰ Some commentators in the proceeding noted that in regions such as the Texas Rio Grande Valley, more than 50 percent of Households are over-the-air dependent. Particularly with the transition to digital television in 2009, it is important that we better understand the use of over-the-air television as a news source, particularly for over-the-air dependent households. Such an analysis should be broken down by race, ethnicity, language and REGION.

The study should also examine perceptions of bias and lack of objectivity, as well as inclusion of treatment of women and people of color in newscasting and reports. The study should examine how such perceptions affect choice of media outlet and how they vary with owner characteristics. The study should also ask respondents about which media they use to find out about news pertinent to ethnic, racial or other segments of the community. Use of news sources changes when audiences are searching for news more targeted to their community or a community of interest than when they are looking for general news.

Study #2 Ownership Structure & Robustness of Media: Competition within Types of Media and Across Media Platforms

⁸ See, Pew, Digital Divisions.

⁹ California adopted a bill, AB2987 on September 29, 2006 which permits a statewide franchise for the deployment of infrastructure to support video and broadband. The bill requires that within three years of authorization for deployment, at least 25% of the households with access to the license holder’s video service be low-income, and within 5 years, at least 30% of the households with access to the license holder’s video service be low-income.

¹⁰ Media Bureau Staff Report, Over-the-Air Broadcast Television Viewers, February 28, 2005, MB Docket No. 04-210.

The FCC proposed study would examine the ownership structure and robustness of current media, including broadcast and satellite television and radio, newspapers, Internet, and cable TV. The structure will be described in terms of national ownership, local ownership, cross-ownership, minority ownership, joint ownership, & independent ownership. Robustness will be described based on availability, penetration, subscriptions, and financials of media providers. Results will be compared to state of media when FCC last reviewed ownership rules.

Comments about study topic and methodology:

The studies should also examine female ownership; Section 309(j) of the Telecommunications Act of 1996 requires the FCC to promote the opportunity for small, women, minority-owned business and rural telecommunications companies to participate in the provision of spectrum-based services. The FCC should also look at the effect of consolidation on minority and female ownership. In consolidated markets, has minority or female ownership increased or decreased? The September 2006 study by Freepress, “Out of the Picture: Minority & Female TV Station Ownership in the United States, Current Status, Comparative Statistical Analysis & the Effects of FCC Policy and Media Consolidation,” found that television markets with minority owners are significantly less concentrated than markets without minority owners.¹¹ Freepress’ analysis of television ownership also found that markets that saw the addition of new minority owned stations since 1998 are significantly less concentrated than markets that did not gain new minority owners.¹² The Freepress study also suggested the FCC conduct a comprehensive study of every licensed broadcast radio and television station to determine the level of female and minority ownership, examining changes since 1999, focusing on station format and content including local news, and analyzing the effect of consolidated markets on minority and female ownership. An FCC study of market concentration and minority and female ownership in radio similar to that conducted by Freepress of market concentration for television markets would yield useful data in examining the effects of consolidation policies since the passage of the Telecommunications Act of 1996.

The FCC study should examine factors that influenced minority and women owners’ decisions to buy or sell stations since the Telecommunications Act of 1996, including ownership consolidation, major mergers with spinoffs, capital markets and access to capital. The study should also seek information on the effect of consolidation on advertising prices. Many minority owners allege that some consolidators will sell advertisements on their African-American formatted stations for \$1 in a package with their other stations (a dollar a holler), making competition impossible for minority and small entrepreneurs who cannot amortize their costs across several stations in a market or across several markets.¹³ The study

¹¹ S. Derek Turner, Mark Cooper, Out of the Picture at p. 22, available at: http://www.stopbigmedia.com/files/out_of_the_picture.pdf. (finding that markets with a minority owner have a total day Herfindahl-Hirshman Index (HHI, a concentration measure commonly used in antitrust analysis) of 2511 versus 3716 for markets without a minority owner.

¹² Id.

¹³ National Association of Black-Owned Broadcasters, Spring Management Conferences, May 25, 2006. In television, minority owners controlled an average of 1.9 stations, women controlled 2.3 stations and non-minorities controlled 5.4 stations. Turner and Cooper, *supra* n. 11, p. 23.

should also examine the interaction of consolidation with the practices in the advertising industry that pay broadcasters with minority formats or minority audiences less than those with non-minority formats or audiences.¹⁴ Such practices result in lower cash flows for stations which program in minority-oriented formats and serve predominantly minority audiences, making it more difficult to attract financing needed to buy other stations and creating disincentives to provide such programming.

As telecommunications companies are entering the video marketplace, the role of rural and non-rural telcos should also be examined, particularly with reports of telecommunications companies failing to deploy broadband to rural areas or divesting rural customers.¹⁵

The study should also examine the format and language of the broadcast by owner, as well as audience composition data. An examination of television should also include Low Power Television, especially in light of the DTV transition. Class A and Low Power Television stations should also be required to file Form 323 with the FCC, providing information on the race, ethnicity and gender of the owner. Low Power Television has been an important entry point for many minority owners and more data is needed to assess the effect of consolidation policies on Low Power television.

The study should also examine secondary market transactions in broadcast and wireless, which the FCC ratifies when it approves the license transfer requests. Most broadcast licenses are acquired on the secondary market from other licensees rather than from the FCC. Secondary market transactions raise capital market issues, as well as “old boy networks,” in how firms find out about the availability of licenses for transfer.¹⁶ The Failed Station Solicitation Rule, consideration of which the court remanded in Prometheus Broadcasting v. FCC, 373 F.3d 372 (3rd Cir. 2004) was one effort to address these barriers in television, at least for failing stations. The study should also examine the effect of elimination of the tax certificate program, particularly in light of the continuation of the tax-free exchange program which benefits incumbent broadcasters with a license to trade. The FCC should examine secondary market transactions in light of the proposals suggested by the Minority Media and Telecommunications Council and the FCC’s Diversity Advisory Committee.

Study #3 Effective Ownership Structure and Robustness of the Quantity and Quality of TV programming

The FCC proposed study will analyze effect of ownership structure and robustness as described in Study #2 as to quality and quantity of TV programming. A

¹⁴ Phillip M. Napoli, Audience Valuation and Minority Media: An Analysis of the Determinants of Radio Audiences, 46 J. Broadcasting & Electronic Media 169 (2002).

¹⁵ See, Ken Belson, Rural Area left in Slow-lane of High-Speed Data Highway, New York Times, September 28, 2006.

¹⁶ See, William D. Bradford, Discrimination in Capital Markets, Broadcast/Wireless Spectrum Service Providers and Auction Outcomes, December 5, 2000 (FCC Policy Forum on Market Entry Barriers Faced by Small, Minority and Women Owned Business in the Communications Industry, Dec. 12, 2000) available at http://www.fcc.gov/opportunity/meb_study/capital_market_study.txt.

cross-sectional and/or time sensitive regressive analysis approach will be used and would consider additional media characteristics and programming types. Variables of interests include:

- hours of programming
- ratings
- awards won

Effects of the following types of TV programming will be reported separately:

- local news
- minority programming
- children's programming
- family programming
- independent programming
- violent programming
- religious programming

Comments about study topic and methodology:

In studying television program quality and quantity, it is important to capture differences in race, ethnicity, language, gender and age between program preferences. Such preferences may lead to different perceptions of quality and adequacy of programming. Half of the top 10 television programs in African-American are not ranked as top 10 in overall households,¹⁷ The study should examine not only the extent of such preference differences between demographic groups, but also the extent of audience overlap or duplication for programming between demographic groups. Audience duplication is one indicator of the extent to which one program may be a substitute for another.

An examination of "quality" must explore how "quality" is defined and according to what standards. It must also examine the issue of exclusion and stereotyping of people of color and women. Many television programs have few minorities on their cast or have all minority casts.¹⁸ Other programs portray people of color stereotypically: Latino/a characters were four times more likely to portray domestic workers than other racial or ethnic groups¹⁹ In the 2003-2004 season, one-half of the Arab American characters were portrayed as criminal, as compared to 15% of Latino/a and Asian/Pacific Islander characters, 10% of African American characters, and only 5% of White characters.²⁰ Research also shows a longstanding invisibility – what has been called "symbolic annihilation" – of women in

¹⁷ See, for example, Nielsen's Top 10 TV Ratings: Among African-Americans, For week of 11/07/05-11/13/05, available at: http://www.nielsenmedia.com/ratings/among_african-americans.html; Top Ten Primetime broadcast TV programs, For week of 11/07/05-11/13/05, available at: http://www.nielsenmedia.com/ratings/broadcast_programs.html.

¹⁸ See, Leonard M. Baynes, White Out: The Absence and Stereotyping of People of Color by the Broadcast Networks in Prime Time Entertainment Programming, 45 Ariz. L. Rev. 293, 315-316 (2003).

¹⁹ Children NOW, Fall Colors: Prime Time Diversity Report 20003-2004, at 2 (2004).

²⁰ Id. at 6.

serious news and programming.²¹ The FCC should also look at the nexus between ownership and broadcast programming and format, including portrayal of stereotypes, inclusion or absence of diverse characters, whether owners focus their programming, including news and public affairs on minority or women audiences,²² and audience composition.

The study should also examine the extent and type of localism offered by the media, defined as coverage of local news and public affairs. In addition, the study should also document the percentage of local news broadcasts focused on violent crimes and how they depict minorities as compared to white perpetrators.²³ Localism should also address whether issues of interest to different demographic and language-preference groups are being addressed in the media. Recent research among ethnic minorities living in the Washington, DC, area, for example, indicated they believed the local news was doing a good job when it covered issues relevant to their daily problems and experiences, and when it featured sources they knew or could relate to (i.e., like themselves).²⁴

The study should also examine:

Rebroadcasts of programming on affiliated cable or other cross-owned networks

Analyze ratings and the continued broadcasting (or cancellation) of network-owned shows as compared to the ratings and the continued broadcasting (or cancellation) of nonnetwork-owned shows

Examine indecent programming by owner characteristics

#4 Curtailment of News Operations in TV and Radio and in Newspapers

The FCC proposed study would collect data on radio, TV, and newspapers that have curtailed or terminated news programming, including newspaper closures. The study will analyze the relationship between reductions in news programming and market characteristics, including ownership structure and robustness. (see study #2)

Comments about study topic and methodology:

²¹ See Gaye Tuchman, "Introduction: the symbolic annihilation of women by the mass media," in G. Tuchman, A. K. Daniels, and J. Benet (Eds.), *Hearth & Home: Images of women in the mass media*. New York: Oxford University Press. The term, originally posed by George Gerbner, has been used widely since Tuchman first applied it to women in media.

²² Jeff Dubin & Matthew L. Spitzer, Testing Minority Preferences in Broadcasting, 68 S. Cal. L. Rev. 841, 869 (1995) (finding a nexus between minority owned stations and minority-oriented programming); Christine Bachen, Allen Hammond, IV and Laurie Mason, Diversity of Programming in the Broadcast Spectrum, Is there a Link Between Owner Race or Ethnicity and News and Public Affairs programming? 26 (FCC Policy Forum on Market Entry Barriers Faced by Small, Minority and Women Owned Business in the Communications Industry, Dec. 12, 2000) available at http://www.fcc.gov/opportunity/meb_study/content_ownership_study.pdf.

²³ See Jerry Kang, Trojan Horses, 118 Harv. L. Rev. 1489 (2005).

²⁴ Byerly, C. M.; Langmia, K., and Cupid, J. A. (2006). Media Ownership Matters: Localism, The Ethnic Minority News Audience and Community Participation." Report. Write: cbyerly@howard.edu.

The study should be clear about what is characterized as "news programming." The FCC has approved Leno, Oprah, etc. as "news programs" for purposes of the political broadcasting rules. Would such programs be included or excluded in the definition of news programming for purposes of this study?

The study should also examine the target news audience to whom service is being curtailed, terminated or expanded. There are few major newspapers such as the El Nuevo Herald and La Opinion which publish in non-English languages, and many of these are owned by large corporate media. Some newspapers such as the Mercury News had foreign language editions (a Vietnamese edition for the Mercury News) but terminated those editions. The gap may be served by smaller community newspapers, national or regional newspapers, other media sources or is often not served at all.

The study should also examine curtailment or termination of news programming on broadcast radio and television. It should also examine whether curtailment or termination of broadcast news programming disproportionately affects certain demographic groups. The Radio and Television News Directors Association found that music stations are the primary source of news on the radio, and that African-Americans and Latinos use radio for more minutes and for longer times of the day and night than other racial or ethnic groups.²⁵ This was reinforced more recently by Byerly, Langmia and Cupid, with respect to urban-suburban minority audiences.²⁶ Thus, curtailment or termination of news programming on music stations may have a larger effect on some groups than others.

Study #5 Station Ownership Programming and Listenership in Radio

The FCC proposed study will be based on Sweeting (2006) which focuses on music radio and will use station-level data to identify how the ownership structure affects programming and listenership of radio stations. Although Sweeting focused on music, the study could be expanded to focus on local news and local produced programming in general. The study would examine whether economics of scope lead to increases in station quality.

Comments about study topic and methodology

The study must examine and define what is meant by station quality. By what metrics is quality being measured, by quantity, depth, topics, diversity, inclusiveness, relevance to the community or some other measures? The study should also recognize that part of the way stations contribute to diversity is by discussing topics that are underexamined on other stations. For example, minority-owned station KJLH-AM in Los Angeles led a community-oriented discussion on the causes of the Los Angeles riots that won a Peabody award. KJLH covered the topic in a different way than did other stations in Los Angeles, broadening the dialogue and diversity.²⁷

²⁵ Radio and Television News Directors Foundation (2001) The American radio news audience survey: Examining the use, perception and future of radio news. <http://www.rtna.org/radio>.

²⁶ Supra n. 26.

²⁷ See P. Johnson, Black radio politically defined: Communicating community and political empowerment

Study #6 Independence of News Coverage by Cross-Owned Newspaper and TV Stations

The FCC proposed study would examine the effect of newspaper cross-ownership on TV news coverage using matched pairs of cross-owned and non-cross-owned TV stations. Specifically, for samples DMAs with newspaper-TV cross-ownership, the cross-owned TV station would be matched with a non-cross-owned TV station in the same DMA with similar characteristics. The study would identify differences in stories covered by local news of matched stations and differences would be analyzed to identify the effects of cross-ownership

Comments about study topic and methodology

The study must recognize and analyze the consequences of the cross-owned pairs predominantly, if not exclusively, involving English language newspapers and television stations. The non-cross owned stations in the study as proposed by the above methodology would also likely have an English-language format. As such, they will capture the dynamics of news only in English, but not news in other languages, more specifically targeted at non-English speaking viewers. The study should examine the implications of the cross-ownership rules for non-English speaking communities.

Other Studies: Suggestions for Other Key Topics to Study Regarding Media Consolidation

A. Employment Opportunities and their Effect on Media Ownership Opportunities

The FCC should examine the extent and type of employment opportunities in media, including radio, television, cable, satellite and the internet. It should explore the link between diversity in employment and programming, and it should explore whether media employees of color face hostile work conditions and discrimination on the job. It should also examine the linkage between employment opportunities and ownership opportunities. It should examine the effect of its policies on minority and female employment since Lutheran Church v. FCC, 141 F.3d 344 (D.C. Cir. 1998).

B. Economic model for tradeable “Diversity Credits”

The FCC should commission a study examining the economic impact of an FCC policy that would provide a transferable credit or voucher to any winner in an FCC spectrum auction that (1) certifies that it will use its spectrum license or licenses to provide service to an underserved market; (2) makes a satisfactory showing that it has entered into a transaction with a socially and economically disadvantaged business.

In addition, the study should examine the economic impact and consequences of (1) an FCC

through Stevie Wonder's KJLH-FM, 1999-2002, Political Communication, 21, 353-367.

policy of expedited review for a license assignment, transfer-of-control and de facto transfer leasing applications where the applications contain a certification that notice of intent to sell or lease spectrum under the license was disseminated in a manner that allowed notice to be provided to minorities; and (2) an FCC policy to forbear from application of the requirement that the FCC pre-approve individual telecommunications common carrier license assignment and transfer-of-control applications where (i) such applications do not raise public interest or competition issues and (ii) such applications would result in minority ownership of 25 percent or greater.

C. FCC waivers, their consistency and the factors driving them

D. Minority and female participation in broadcast auctions at each state, application, upfront payments, bidding, winning, building out

It is also important that an examination of auctions include unsuccessful applicants for broadcast and wireless licenses, including those who wanted to apply but did not. The KPMG study commissioned by the FCC, Utilization Rates, Win Rates, and Disparity Ratios for Broadcast Licenses Awarded by the FCC,²⁸ only constituted a pool of those who obtained licenses through the auction process. The KPMG study suggested further examination of those who wanted to apply for a license but did not because of discriminatory barriers. That type of analysis would refine the understanding of “availability” for a license which is central to an investigation of whether certain groups are underutilized in the licensing process. The study would focus on what would be a reasonable pool of possible applicants based on who applied in previous FCC auctions and comparative hearings.

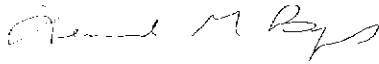
²⁸ KPMG LLP, Economic Consulting Services, Utilization Rates, Win Rates, and Disparity Ratios for Broadcast Licenses Awarded by the FCC, at 16, November 2000, available at http://www.fcc.gov/opportunity/meb_study/broadcast_lic_study_pt2.txt.

The role of the existence or elimination of installment payments, bidding credits for minorities and women, bidding credits for small businesses or designated entities and other types of bidding credits in auctions should also be examined. The analysis should compare the race-and gender neutral and race and gender- conscious policies to see how minorities, women and small businesses fared.

Sincerely,



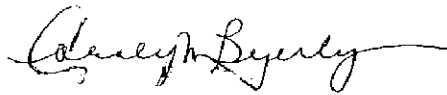
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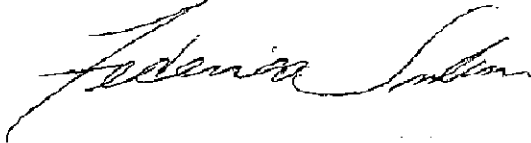


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Comments Regarding MB Dockets No. 06-121, 02-277, 01-235, 01-317, 00-244

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